

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

REBECCA GATHMANN-LANDINI,  
individually and on behalf of other persons  
similarly situated,

Plaintiffs,

- against -

LULULEMON USA INC.; and any other related  
entities,

Defendants.

**Index No.: 15-CV-6867(JMA)(AYS)**

**STIPULATION TO TOLL FLSA  
CLAIMS**

WHEREAS, a telephone conference with the Court was held on August 8, 2016;

WHEREAS, the Court directed the parties file a stipulation tolling claims under the Fair Labor Standards Act ("FLSA") for members of the putative FLSA collective from July 12, 2016 through the Court's order on lululemon usa inc.'s ("Defendant") pending motion to dismiss Plaintiff's Amended Complaint (*see* ECF No. 28) (the "Motion");

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for Plaintiffs and counsel for Defendant, that:

1. The statute of limitations with respect to any claims arising under the FLSA for any putative collective action member is and shall be tolled from July 12, 2016 going forward until such date as this Court issues an order resolving Defendant's Motion.

2. Plaintiffs reserve all rights to request additional tolling of the statute of limitations with respect to any claims arising under the FLSA prior to July 12, 2016 or subsequent to an order resolving Defendant's Motion, and Defendant reserves all objections and defenses with respect to same.

New York, New York  
September 12, 2016

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SO ORDERED:

Honorable Joan M. Azrack, U.S.D.J.